

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

In Re: ETHICON, INC. PELVIC REPAIR	:	
SYSTEM PRODUCTS	:	CIVIL ACTION No. 2:12-md-02327
LIABILITY LITIGATION	:	
	:	MDL No. 2327
	:	
This Document Relates to All Actions	:	Judge Joseph R. Goodwin
	:	

**MDL PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY
IN OPPOSITION TO THE SECANT MEDICAL DEFENDANTS'
MOTION TO STAY ENFORCEMENT OF A SUBPOENA**

The MDL Plaintiffs hereby give notice of an Order of the Philadelphia County Court of Common Pleas entered December 5, 2013 in *Bernice P. Hansen, et al. v. Ethicon, Inc., et al.*, docketed in May Term 2013 at No. 3785. This Order grants the plaintiffs' motion to compel the deposition of Erik J. Nadeau, Secant's former president. In addition to ordering Mr. Nadeau to appear for a deposition, the Order directs Secant to produce documents without objection pursuant to the notice for Mr. Nadeau's deposition, in order to develop a factual record regarding Secant's status under the Biomaterials Access Assurance Act, 21 U.S.C. §§ 1601, *et seq.*

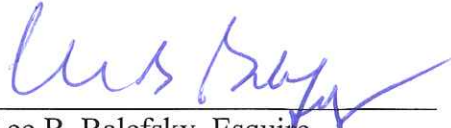
This supplemental authority bears on Secant Medical's Motion to Stay Enforcement of a Subpoena, filed October 28, 2013 as Document No. 898. Plaintiffs responded to that motion on November 12, 2013 as Document No. 928.

A copy of the December 5 Order is attached as Exhibit A.

A copy of the Notice of Deposition for Erik J. Nadeau and accompanying schedule of documents for production is attached as Exhibit B.

Respectfully submitted,

Kline & Specter, P.C.



Lee B. Balefsky, Esquire
Michelle L. Tiger, Esquire

Dated: December 6, 2013

1525 Locust Street, 19th Floor
Philadelphia, PA 19102
(215) 772-1000
lee.balefsky@klinespecter.com
michelle.tiger@klinespecter.com

Counsel for Plaintiffs

/s/Bryan F. Aylstock
Bryan Frederick Aylstock
D. Renee Baggett
AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC
Florida Bar No.: 78263
17 E. Main St., Ste. 200
Pensacola, Florida 32502
Telephone: 850.202.1010
Facsimile: 850.916.7449
baylstock@awkolaw.com
Rbaggett@awkolaw.com

/s/ Thomas P. Cartmell
Thomas P. Cartmell
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
816-701-1102
Fax 816-531-2372
tcartmell@wcllp.com

Plaintiffs' Co-Lead Counsel